

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)	
)	
)	No. 08 CR 888-1
)	
v.)	Judge James B. Zagel
)	
ROD BLAGOJEVICH)	

**GOVERNMENT'S UNOPPOSED MOTION
TO EXONERATE BOND**

The United States of America by its attorney, PATRICK J. FITZGERALD, United States Attorney of the Northern District of Illinois for its motion, moves as follows:

1. Pursuant to a Court Order entered on July 11, 2011, Rod Blagojevich and Patricia Blagojevich posted their interest in certain real property to secure the defendant's release on bond. As a result, the property was encumbered pending the defendant's completion of the bond requirements.

2. As the defendant has been convicted, sentenced and has surrendered to the federal correctional institution to begin the custody portion of his sentence, the security for the bond is no longer required. The government hereby submits this motion to exonerate the bond. In addition, the government requests that this Court order the release of any lien or other encumbrance lodged against the real property as it relates to this bond and further order that the quit claim deed executed in favor of the United States of America, currently held in the custody of the Clerk of the United States District Court, Northern District of Illinois, be returned to the sureties in care of defense counsel. The government requests that any limitations on funds held from the sale of certain real property in a 1031 exchange account be eliminated.

3. Defendant's counsel has been contacted regarding this motion and counsel has no objection to the motion or the entry of the Order.

WHEREFORE, the government respectfully requests this Court exonerate the bond posted in this case.

Respectfully submitted,

PATRICK J. FITZGERALD
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CERTIFICATE OF SERVICE

GOVERNMENT'S UNOPPOSED MOTION TO EXONERATE BOND was served on March 20, 2012, in accordance with FED. R. CRIM. P. 49, FED. R. CIV. P. 5, LR 5.5, and the General Order on Electronic Case Filing (ECF) pursuant to the district court's system as to ECF filers.

s/Reid Schar

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